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*Indirect Purchaser Plaintiffs*  
*Interim Co-Lead Class Counsel*

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES  
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)  
MDL No. 2420

This Documents Relates to:  
  
ALL INDIRECT PURCHASER ACTIONS

SUPPLEMENTAL DECLARATION OF  
JEFF D. FRIEDMAN IN SUPPORT OF  
MOTIONS FOR PRELIMINARY  
APPROVAL OF SETTLEMENTS WITH  
LG CHEM, HITACHI MAXELL, AND  
NEC CORPORATION

Date: March 14, 2017  
Time: 2:00 p.m.  
Dept: Courtroom 1, 4th Floor  
Judge: Hon. Yvonne Gonzalez Rogers

DATE ACTION FILED: Oct. 3, 2012

1 I, JEFF D. FRIEDMAN, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of  
3 California in the above-titled litigation. I am a partner with the law firm of Hagens Berman Sobol  
4 Shapiro LLP, counsel of record, alongside Cotchett, Pitre & McCarthy, LLP, and Lieff, Cabraser,  
5 Heimann & Bernstein LLP, for the indirect purchaser plaintiffs (IPPs) in the above-titled action.  
6 Based on personal knowledge or discussions with counsel in my firm and the other counsel of  
7 record in this case of the matters stated herein, if called upon, I could and would competently  
8 testify thereto.

9 2. Pursuant to the directions of the Court at the February 28, 2017 hearing regarding  
10 the motions for preliminary approval of the settlements with Defendants Hitachi Maxell, Ltd. and  
11 Maxell Corporation of America (collectively, Hitachi Maxell), NEC Corporation (NEC), and LG  
12 Chem, Ltd. and LG Chem America, Inc. (collectively, LG Chem), IPPs have modified the  
13 proposed Long-Form Notice about these settlements, the proposed Summary Notice, and the  
14 [Proposed] Order Granting Preliminary Approval of Settlements with Hitachi Maxell, NEC, and  
15 LG Chem.

16 3. Attached hereto are true and correct copies of the following exhibits:

17 Exhibit 1: *Redlined* Version of Long-Form Notice of IPPs' Settlements with LG Chem,  
18 Hitachi Maxell, and NEC, which shows the changes to that notice since the  
February 28, 2017 hearing;

19 Exhibit 2: *Clean* Version of Long-Form Notice of IPPs' Settlements with LG Chem,  
20 Hitachi Maxell, and NEC;

21 Exhibit 3: *Redlined* Version of Summary Notice of IPPs' Settlements with LG Chem,  
22 Hitachi Maxell, and NEC, which shows the changes to that notice since the  
February 28, 2017 hearing;

23 Exhibit 4: *Clean* Version of Summary Notice of IPPs' Settlements with LG Chem,  
24 Hitachi Maxell, and NEC; and

25 Exhibit 5: *Redlined* Version of [Proposed] Order Granting IPPs' Motions for  
26 Preliminary Approval of Settlements with Hitachi Maxell, NEC, and LG  
27 Chem, which shows the changes to the proposed Order since the February  
28 28, 2017 hearing. The clean version of the proposed order has been  
submitted concurrently herewith as a standalone proposed order.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed this 9th day of March, 2017, at Berkeley, California.

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4 s/ Jeff D. Friedman  
JEFF D. FRIEDMAN  
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